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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

NATIONAL URBAN LEAGUE, *et al.*,

Plaintiff,

v.

WILBUR L. ROSS, JR., *et al.*,

Defendants.

Case No. 5:20-cv-05799-LHK

**DECLARATION OF
JAMES T. CHRISTY**

1 I, James T. Christy, make the following Declaration pursuant to 28 U.S.C. § 1746, and state
2 that under penalty of perjury the following is true and correct to the best of my knowledge and
3 belief:

4 1. The number of enumerators employed by the Census Bureau on the following dates
5 are as follows:

6 August 29, 2020: 239,595

7 September 5, 2020: 231,700

8 September 15, 2020: 224,406

9 2. These numbers are a snapshot in time. They change frequently as enumerators
10 leave and we hire additional enumerators.

11 3. The enumerator position is temporary. Most enumerators work 8 weeks or less,
12 and average 19 hours per week.

13 4. It is not possible under the Census Bureau's systems to identify the precise reasons
14 for the reduction in the number of enumerators stated in paragraph 1 above. This is because the
15 Decennial Applicant Personnel and Payroll System (DAPPS) aggregates and provides reasons for
16 termination for all temporary field staff (Enumerators, Census Field Supervisors, Clerks, Office
17 Operations Supervisors, and Recruiting Assistants). The system does not, however, allow me to
18 isolate just enumerator positions. Below is information reflected in DAPPs from September 7 to
19 the present regarding departures of all staff (including, but not limited to, enumerators).

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Action Type	Number
Death	5
Expiration of Appointment	233
Lack of Work	520
Misconduct	640
Resignation	16,069
Unsatisfactory Performance	349
Total	17,816

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1 5. The table above does not reflect new hires during this period. The Census Bureau
2 hired 14,599 new temporary field staff since September 7, 2020.

3 6. The "Lack of Work" reason on termination actions is used primarily to release staff
4 when no more work is available for the employee. This can be the result of all work in an area
5 being completed or the scheduled end of an operation. This reason is also used for employees who
6 are not interested in other work assignments, for example, working in a different Census Field
7 Manager (CFM) area or traveling to another Area Census Office.

8 7. I retrieved the data reflected in the chart above following the submission of my
9 declaration on September 15, 2020, ECF 127-1, where I stated that "we are only separating
10 enumerators who voluntarily resign or those with a conduct or performance problem."
11 Accordingly, we will be reiterating our guidance to field managers to remind them of their
12 obligations under the TRO.

13
14 I have read the foregoing and it is all true and correct.

15 DATED this _16__ day of September, 2020
16
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18 _____
19 James T. Christy

20 Assistant Director for Field Operations

21 United States Bureau of the Census
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